

Ex. 'B'

Declaration of
Lillian Jo Sondgeroth Donohue

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

LILLIAN JO SONDGEROTH DONOHUE,

Debtor.

Case No.: 22-11027-ABL
Chapter 13

Date: August 03, 2022
Time: 9:30 a.m.

**PURSUANT TO 28 U.S.C. §1746 LILLIAN JO SONDGEROTH DONOHUE
DECLARES THE FOLLOWING:**

I, Lillian Jo Sondgeroth Donohue, declare under penalty of perjury that the foregoing
is true and correct:

1. That I am the above-mentioned Debtor in this Chapter 13 bankruptcy case.
2. That on March 24, 2022 I filed a Chapter 13 bankruptcy case.
3. That I am 74 years old.
4. That on Schedule A/B of my petition, I listed my commercial property,
located at 2240 East Calvada Blvd., Pahrump, Nevada 89048 ("2240 East
Calvada Blvd.,").
5. That I listed The Wardlow Survivor's Trust Dated December 27, 2012
("Wardlow Trust"), as a secured creditor. They are the lien holder on my
commercial property located at 2240 East Calvada Blvd., Pahrump, Nevada
89048.
6. That on May 20, 2022, I amended my schedules to list the Wardlow Trust
debt as contingent and disputed (Dkt. #41).

- 1 7. That I value 2240 East Calvada Blvd., property at between \$540,000 and
2 \$600,000 with the Wardlow Trust owed a disputed amount of \$360,000
3 (Dkt.#41, Amended Schdl 'A/B' and 'D').
- 4 8. That I have paid on this property since 2006 for about 15 years.
- 5 9. That the Wardlow Trust holds a disputed note and deed of trust on the 2240
6 East Calvada Blvd., property. The note was executed in 2006, as was the deed
7 of trust.
- 8 10. That under the terms of the note, all amounts came due and payable on
9 January 9, 2009.
- 10 11. That over the years, we have signed four modification agreements, extending
11 the maturity date. None of these modification agreements were recorded in
12 the Nye County Recorder's office until *after* the bankruptcy had been filed.
- 13 12. That the Wardlow Trust recorded three of the four extension modification
14 agreements post-petition on June 7, 2022 (Dkt.#60, p.7, ln.5-16).
- 15 13. The fourth modification extension was recorded on June 21, 2022 (Ex. 'A')
- 16 14. That the Wardlow Trust admits it took the actions of recording those loan
17 extensions post-petition (Dkt.#60, p.10, ln.21-23).
- 18 15. That at that time the Wardlow Trust knew of my Chapter 13 bankruptcy
19 filing.
- 20 16. That the Wardlow Trust has filed two (2) motions to lift stay (Dkt.#21 and
21 #33).
- 22 17. That I am currently trying to sell 2240 East Calvada Blvd., for approximately
23 \$540,000.
- 24 18. That learning that the Wardlow Trust placed those liens on 2240 East
25 Calvada Blvd., on June 7, 2022, and June 21, 2022 has been very upsetting
26 and has made me very concerned for the sale of this property and any
27

proceeds.

19. That because of all this added stress and worrying that the Wardlow Trust actions have caused, it has cost me a loss of sleep and anxiety the past two weeks.

20. That I have spent about \$50 in gas going back and forth to my attorney's office.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 22nd day of June, 2022.


Lillian Jo Sondgeroth Donohue